



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

JAN 25 2013

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Lason Kirkland  
Operations Manager  
Perma-Fix of South Georgia, Inc. (PFSG)  
Azalea Industrial Park  
1612 James P. Rogers Circle  
Valdosta, Georgia 31601

SUBJ: RCRA Compliance Evaluation Inspection  
EPA ID # - GAD 093 380 814

Dear Mr. Kirkland:

On January 12, 2012, the U.S. Environmental Protection Agency and the Georgia Environmental Protection Division (GA EPD) conducted a RCRA compliance evaluation inspection at your facility located in Valdosta, Georgia, in order to determine its compliance status with RCRA.

A RCRA CEI Report was forwarded to your facility under a cover letter dated September 24, 2012. Upon having discussions with GA EPD personnel present during the CEI, it has been determined that several findings and violations in EPA's CEI Report could be more accurately set forth with amended findings and apparent violations which are specifically set forth below.

1. The third paragraph on page 4 should be replaced with the following paragraph:

Observations made on blend pots F-3 and F-4 in this area, which managed solid/liquid materials for fuel bulking purposes, found F-3 to be missing a cover (Photo 11) for the tank portion of the unit. **PFSG appeared to be in violation of Permit Condition IV.D.4. of Permit No. HW-0020(S&T) by failing to comply with all the applicable rules of 40 C.F.R. Section 264 Subpart CC, specifically 40 C.F.R. § 264.1084(c)(3) which requires that tanks managing hazardous waste which requires Tank Level 1 controls be installed and secured in the closed position.**

2. The third paragraph on page 5 should be amended to include the apparent violation language as follows:

One covered top truck trailer, which contained primarily solid hazardous wastes, was also observed in this area. At the time of the inspection, the truck was leaking some liquids from the rear end of the trailer. Facility employees proceeded to clean up the spilled material and repackaged the solid

materials into a new open top truck trailer at the time of the inspection. **PFSG appeared to be in violation of Permit Condition II.B.6. of Permit No. HW-0020(S&T) by failing transfer hazardous waste from containers which are not in good condition or leaking.**

3. The fourth paragraph on page 5 should be amended to include the apparent violation language as follows:

During an inspection of tanks T210, T208, and T42, two leaking pipe fittings were observed on pipes connected to and beneath tank T42 (Photos 13 & 14). The slowly leaking material was falling onto the units concrete secondary containment system. **PFSG appeared to be in violation of Permit Condition IV.E. of Permit No. HW-0020(S&T) by failing to take a tank system which is leaking out of service. PFSG appeared to be in violation of Permit Condition IV.D. of Permit No. HW-0020(S&T) by placing hazardous waste in a tank system which is leaking and is not in compliance with the applicable regulations of 40 C.F.R. Part 264 Subparts BB and CC.**

4. The fifth paragraph on page 5 should be amended to include the apparent violation language as follows:

This area was closed with the use of a metal corrugated wall at the time of the inspection. The area is equipped with two internal baghouses which each drop dust into 55-gallon satellite accumulation drums which were closed and labeled with the words "Hazardous Waste" at the time of the inspection. Four covered roll-off containers were also observed in the area. Each was properly labeled and dated at the time of the inspection. **PFSG appeared to be in violation of Permit Condition I.F.2.f of Permit No. HW-0020(S&T) by failing to comply with 40 C.F.R. § 264.31 which requires that owners and operators manage their facilities in a manner which minimizes the possibility of a release of hazardous waste or hazardous waste constituents.**

5. The second paragraph on page 7 should be amended to cite the following apparent violation:

**PFSG appeared to be in violation of Permit Condition II.B.10. of Permit No. HW-0020(S&T) by failing to store incompatible wastes in the same storage area and container without separating the wastes properly with a dike, berm or wall in accordance with 40 C.F.R. § 264.199 and 40 C.F.R. § 264.17(b).**

6. The following paragraph should be added to the Record Review findings on page 7:

At the time of the CEI, EPD's Mike Elster, upon observing a specific container during the CEI, provided PFSG with a container drum tracking number VC0921. PFSG was not able to locate this container during the CEI. **PFSG appeared to be in violation of Permit Condition I.F.2.n of Permit No. HW-0020(S&T) by failing to have a functioning container tracking system in accordance with 40 C.F.R. § 264.70-72.**

If you have any questions, please contact Daryl Himes at (404) 562-8614.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Lamberth", with a long horizontal flourish extending to the right.

Larry Lamberth  
Chief, South Enforcement and Compliance Section  
RCRA and OPA Enforcement and Compliance  
Branch

Enclosure

cc: Michael Elster-GA EPD

